

**In the United States District Court for the  
Eastern District of Missouri  
At St. Louis**

Patricia Henry and	)	
Julienne Northe,	)	
	)	
Plaintiffs,	)	
	)	Case No. 4:09-CV-01871-AGF
vs.	)	
	)	
C.R. England, Inc. and	)	
Matthew Fehlman	)	
	)	
Defendants.	)	

**Plaintiffs' Response to Order to Show Cause**

COME NOW Plaintiffs and for their Response to this Court's Order to Show Cause states:

1. Plaintiffs have been attempting to locate Matthew Fehlman.
2. Most recently, Plaintiffs have located a Matthew Fehlman in Elgin, Illinois, which is located near Defendant Fehlman's old address in Aurora, Illinois.
3. Plaintiffs' counsel has been communicating with defense counsel regarding efforts to locate Defendant Fehlman, as illustrated by the following e-mail:

From: TomHankinsLaw@cs.com  
Sent: Wednesday, February 24, 2010 4:02 PM  
To: O'Keefe, Donald  
Subject: Patricia Henry v. CR England

Dear Don,

Following up on our phone conversation the other day: I believe I have located Matthew Fehlman in Elgin, Illinois. From the map, it appears that Elgin is pretty close to his old address in Aurora. Attached, please find what I located on the Internet. I'm pretty sure that the first page is him. The second page is from Facebook and, from his photo, he appears to be the correct age.

I was not really comfortable contacting him directly since he is, in a loose sense, your client or your client-to-be. Do you want to make contact with him or would you prefer that I continue my efforts? Thanks.

Tom Hankins

4. It was then agreed by counsel that Mr. O'Keefe would follow up on the information provided and report back to Plaintiffs' counsel.

5. As soon as Mr. O'Keefe can verify that the Matthew Fehlman in Elgin, Illinois is, in fact, the Defendant in this case, then Plaintiffs' counsel will take the necessary steps to have Mr. Fehlman served.

6. The delay in getting Mr. Fehlman served is not due to any lack of effort on the part of Plaintiffs or their counsel; rather, it is due to the fact that Mr. Fehlman's address in Aurora, Illinois is no longer a good address for him and that efforts to locate Mr. Fehlman's current whereabouts are ongoing.

WHEREFORE, Plaintiffs submit the foregoing as their Response to this Court's Order to Show Cause.

HANKINS & CONKLIN, P.C.

/s/ Thomas E. Hankins

Thomas E. Hankins - Bar #26005

Wesley D. Hilton - Bar #60944

6812 North Oak Trafficway, Suite 5

Gladstone, Missouri 64118-2587

Telephone: (816) 436-3100

Fax No.: (816) 436-8643

E-Mail: tomhankinslaw@cs.com

**Attorneys for Plaintiffs**

**Certificate of Service**

I hereby certify that on March 14, 2010, I electronically filed the foregoing document with the Clerk of the United States District Court for the Eastern District of Missouri using the CM/ECF system, which sent notification of such filing to the following:

Donald L. O'Keefe  
Rabbitt, Pitzer & Snodgrass, P.C.  
100 South Fourth Street, Suite 400  
St. Louis, Missouri 63102-1821  
Email: okeefe@rpslaw.com

/s/ Thomas E. Hankins

Thomas E. Hankins  
Attorney for Plaintiffs